

**BEFORE  
THE PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
DOCKET NO. 2019-\_\_\_\_\_-E**

IN RE: Ganymede Solar, LLC,	)	
	)	
Petitioner,	)	<b>MOTION</b>
	)	<b>TO MAINTAIN STATUS QUO</b>
Dominion Energy South Carolina,	)	
Incorporated,	)	
Respondent.	)	

**INTRODUCTION**

Ganymede Solar, LLC (hereinafter as, the “Project”, “Movant”, or “Petitioner”) hereby moves the Public Service Commission of South Carolina (“Commission”), to maintain the status quo between Movant and Respondent, Dominion Energy South Carolina, Incorporated (hereinafter as, “DESC” or “Respondent”), inclusive as of the date of this filing, going forward and relating back to the date of the filing of the Petition in this matter. Namely, that as of the date of this filing, no additional Milestone payments are due and owing. The Petitioner’s Motion follows.

**MOTION TO MAINTAIN STATUS QUO**

Movant moves this Commission to maintain the status quo, between the Movant and Respondent, inclusive as of the date of this filing, going forward and relating back to the date of the filing of the Petition in this matter. The Movant has, *inter alia*, (i) an interconnection agreement (“IA”) Milestone payment deadline that will expire after the date of these presents and (ii) interconnection queue positions. Movant files this Motion to preserve the Movant’s rights under the stated items herein and the Reservation of Rights herein and Movant’s rights in general.

The grounds for this Motion (i) the Project is now unfinanceable, after the effect and unintended consequences of recent Commission decisions, as is set forth in the Petition and (ii) the Respondent DESC’s position in general is that DESC is unable to assist the Project, absent an Order from this Commission. It would be improper and unjust for Movant to lose Contract rights or its queue position, or forfeit substantial payments, because of the effect and unintended consequences of recent decisions of this Commission.

Particulars of Request to Maintain Status Quo.

Because Respondent, DESC is unable to assist the Project with its concerns, as set forth in more detail in the Petition, absent an Order from this Commission, this Motion and the Project's contemporaneous Petition to this Commission is timely and appropriate.

Reservation of Rights.

The Project expressly reserves all of its rights, as of the date of this filing and going forward in general and specifically as to previously tendered Milestone payment(s).

Respondent, DESC.

DESC is named as a Respondent, because it will be affected by future Orders of this Commission in this matter, but the relief sought is expressly from this Commission and not DESC, because of DESC's general position that absent an Order from this Commission, it cannot allow the type of relief sought by the Project.

**WHEREFORE**, the Movant, based on the foregoing, moves to maintain the status quo, between the Movant and Respondent, inclusive as of the date of this filing, going forward and relating back to the date of the filing of the Petition in this matter. The above-referenced Movant respectfully requests that the relief sought in this Motion be granted; and

**FOR SUCH OTHER AND FURTHER RELIEF AS THIS COMMISSION MAY DEEM JUST AND PROPER.**

**[Signature Page Follows]**

This 20<sup>th</sup> day of December, 2019

Respectfully Submitted,  
/s/Richard L. Whitt,

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Richard L. Whitt,  
Richard@RLWhitt.Law  
**WHITT LAW FIRM, LLC**  
401 Western Lane, Suite E  
Irmo, South Carolina 29063  
(803) 995-7719

*As Counsel for Ganymede Solar, LLC.*